

Exhibit A

Noam Biale

From: Mermelstein, Rebecca (USANYS) <Rebecca.Mermelstein@usdoj.gov>
Sent: Wednesday, March 28, 2018 11:08 AM
To: Michael Tremonte; Noam Biale; bl3160@aol.com; dtouger@aol.com
Cc: Quigley, Brendan (USANYS); Tekeei, Negar (USANYS); Sheinwald, Ellie (USANYS)
[Contractor]; Wissman, Eric (USANYS) [Contractor]
Subject: Access to Discovery/Trial Exhibits for Incarcerated Defendants

Counsel,

In light of the pending trial, we have consulted with MCC about the availability of discovery, trial exhibits, and 3500 to the incarcerated defendants in this case. We have confirmed that defense counsel ARE permitted to provide documents in both hard copy and via CD. Hard copy documents and CDS can be viewed in the housing units and the defendants will therefore have largely unlimited time with these documents. Accordingly, we will leave it to you to provide trial exhibits and 3500 to your clients (with the exception of those materials which must remain in your possession pursuant to the protective order and thus may not be provided to the defendants).

With respect to the entirety of the discovery in the case, we are working to retrieve the hard drive containing all but the most recent discovery from FCI Terminal Island so that it can be made available to the defendants at MCC. That hard drive will be available for review both in education and, if necessary, in the evenings in the attorney visiting rooms. (An attorney need not be present for such reviews).

Best,

Rebecca